

Kravit Partners, LLC
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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
MYINT KYAW a/k/a JEFFREY WU,	:	Case No. 20-72407-reg
	:	
Debtor.	:	Hon. Robert E. Grossman
	:	United States Bankruptcy Judge

In re:	:	Chapter 11
	:	
Victoria Towers Development Corp.,	:	Case No. 20-73303-reg
	:	
Debtor.	:	Hon. Robert E. Grossman
	:	United States Bankruptcy Judge

In re:	:	Chapter 11
	:	
Victoria Towers Development Mezz Corp.,	:	Case No. 20-72405-reg
	:	
Debtor.	:	Hon. Robert E. Grossman
	:	United States Bankruptcy Judge

In re:	:	Chapter 11
	:	
Flushing Landmark Realty Mezz LLC,	:	Case No. 20-72404-reg
	:	
Debtor.	:	Hon. Robert E. Grossman
	:	United States Bankruptcy Judge

In re:	:	Chapter 11
	:	
Lucky Star-Deer Park Mezz LLC,	:	Case No. 20-72403-reg
	:	
Debtor.	:	Hon. Robert E. Grossman
	:	United States Bankruptcy Judge

In re:	:	Chapter 11
Lucky Star-Deer Park LLC,	:	
	:	
Debtor.	:	Case No. 20-73301-reg
	:	
	:	Hon. Robert E. Grossman
	:	United States Bankruptcy Judge

In re:	:	Chapter 11
Flushing Landmark Realty LLC,	:	
	:	
Debtor.	:	Case No. 20-73302-reg
	:	
	:	Hon. Robert E. Grossman
	:	United States Bankruptcy Judge

In re:	:	Chapter 11
QUEEN ELIZABETH REALTY CORP.,	:	
	:	
Debtor.	:	Case No. 20-73327-reg
	:	
	:	Hon. Robert E. Grossman
	:	United States Bankruptcy Judge

**VERIFIED STATEMENT OF KRAVIT PARTNERS, LLC PURSUANT TO
RULE 2019 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Kravit Partners, LLC (“KPL”), attorneys for the creditors listed on **Exhibit A** hereto (collectively, the “Parties”), in connection with the chapter 11 cases of the above-captioned debtors-in-possession (collectively, the “Debtors”), respectfully submits this verified statement (this “Statement”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and represent as follows.

1. KPL is serving as counsel to the following Parties in connection with the Debtors’ bankruptcy cases:

- a. Sanford Avenue Partner LLC, 34-30 Collins Place, Flushing, NY 11354;
- b. Xizhu Bai, 2 Arbor Fields Ct., Old Westbury, NY 11568;
- c. W & L Group Construction Inc., 34-28 Collins Place, Flushing, New York 11354;
- d. Meng Hua Wang, 10 St. Andrews Court, Old Westbury, NY 11568;

- e. Zhen En Lin, 133-38 Sanford Avenue, 5F, Flushing, New York 11355;
- a. Xing Mei Ni, 133-38 Sanford Avenue, 6F, Flushing, New York 11355;
- b. Liang Wen Pan, 133-38 Sanford Avenue, 15D, Flushing, New York 11355;
- c. Hui Lin, 133-38 Sanford Avenue, 15B, Flushing, New York 11355; and
- d. Qui Hui Lin, 133-38 Sanford Avenue, 15E, Flushing, New York 11355.

2. The Parties may hold claims against the Debtors arising out of certain agreements (including but not limited to loans, real estate purchase agreements, judgments, construction agreements, construction liens, purchase of notes and mortgages), law, or equity specific to the respective Parties and their relationships with the Debtors. The claims of the Parties may include, but are not necessarily limited to, secured claims, unsecured claims, and administrative claims. Each Party is preparing to state the nature and amount of their claim against the Debtors in their respective proof of claim, to be filed by the applicable deadline.

3. Based upon information provided to KPL by each of Sanford Avenue Partner LLC, Xizhu Bai, W & L Group Construction Inc., Meng Hua Wang, Zhen En Lin, Xing Mei Ni, Liang Wen Pan, Hui Lin, and Qui Hui Lin, attached hereto as **Exhibit A** is a brief description of the nature and amount of currently understood disclosable economic interests of each of the Parties in relation to the Debtors.

4. The pertinent facts and circumstances in connection with the engagement of KPL is that each Party has separately requested KPL to serve as its counsel in connection with these chapter 11 cases. At the time of the engagement of KPL by the Parties, KPL did not have any claims against the Debtors or interests in the Debtors.

5. Nothing contained herein is intended or shall be construed to constitute: (a) a waiver or release of the rights of the Parties to have any final order entered by, or other exercise of the judicial power of the United States performed by, an Article III court; (b) a waiver or release of the rights of the Parties to have any and all final orders in any and all non-core matters entered only after

de novo review by a United States District Court; (c) consent to the jurisdiction of this court over any matter; (d) an election of remedy; (e) a waiver or release of any rights the Parties may have to a jury trial; (f) a waiver or release of the right to move to withdraw the reference with respect to any matter or proceeding that may be commenced in these chapter 11 cases against or otherwise involving the Parties; or (g) a waiver or release of any other rights, claims, actions, defenses, setoffs, or recoupments to which the Parties are or may be entitled, in law or in equity, under any agreement or otherwise, with all such rights, claims, actions, defenses, setoffs, and recoupments being expressly reserved.

6. Nothing contained in this Verified Statement (or **Exhibit A** hereto) should be construed as a limitation upon, or waiver of, any rights of Sanford Avenue Partner LLC, Xizhu Bai, W & L Group Construction Inc., Meng Hua Wang, Zhen En Lin, Xing Mei Ni, Liang Wen Pan, Hui Lin, and/or Qui Hui Lin to assert, file, or amend any claim or proof of claim filed in accordance with applicable law and any orders entered in these cases.

7. The information contained herein is based upon information provided by Sanford Avenue Partner LLC, Xizhu Bai, W & L Group Construction Inc., Meng Hua Wang, Zhen En Lin, Xing Mei Ni, Liang Wen Pan, Hui Lin, and/or Qui Hui Lin, respectively, to KPL and is provided for the purposes of complying with Bankruptcy Rule 2019 and is not intended for any other use or purpose, and is subject to change.

8. KPL reserves the right to amend this Verified Statement as may be necessary in accordance with the requirements set forth in Bankruptcy Rule 2019. The undersigned hereby verifies that this Verified Statement is true and accurate to the best of the undersigned's knowledge and belief.

Dated: New York, New York
December 11, 2020

KRAVIT PARTNERS, LLC

By: /s/ Margarita Y. Ginzburg
Margarita Y. Ginzburg, Esq.
79 Madison Avenue, 2nd Floor
New York, New York 10016
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Exhibit A

Debtor(s)	Creditor	Address	Nature of Claim	Amount
Victoria Towers Development Corp. (“Victoria Towers”)/ Jeffrey Wu	Sanford Avenue Partner, LLC ¹	34-30 Collins Place, Flushing, NY 11354	Purchase of Note/ Mortgage Loan/ Guaranty	Approximately \$40 Million
Jeffrey Wu/Victoria Towers	Xizhu Bai	2 Arbor Fields Ct., Old Westbury, NY 11568	Judgments/Purchase Agreements/Settlement Agreement	Unknown at this time
Victoria Towers /Jeffrey Wu	W & L Group Construction Inc. ²	34-28 Collins Place, Flushing, New York 11354	Work Performed/Loan/Construction Lien/ Guaranty	Unknown at this time
Victoria Towers	Meng Hua Wang*	10 St. Andrews Court, Old Westbury, NY 11568	Loans to Victoria Towers or affiliated entity/Purchase of Units	Unknown at this time
Victoria Towers	Zhen En Lin*	133-38 Sanford Avenue, 5F, Flushing, New York 11355	Loans to Victoria Towers or affiliated entity/Purchase of Unit	Unknown at this time
Victoria Towers	Xing Mei Ni*	133-38 Sanford Avenue, 6F, Flushing, New York 11355	Loans to Victoria Towers or affiliated entity/Purchase of Unit	Unknown at this time
Victoria Towers	Liang Wen Pan*	133-38 Sanford Avenue, 15D, Flushing, New York 11355	Loans to Victoria Towers or affiliated entity/Purchase of Unit	Unknown at this time
Victoria Towers	Hui Lin*	133-38 Sanford Avenue, 15B, Flushing, New York 11355	Loans to Victoria Towers or affiliated entity/Purchase of Unit	Unknown at this time
Victoria Towers	Qui Hui Lin*	133-38 Sanford Avenue, 15E, Flushing, New York 11355	Loans to Victoria Towers or affiliated entity/Purchase of Unit	Unknown at this time

¹ Sanford Avenue Partner LLC is owned by Xizhu Bai and Meng Hua Wang.

² W & L Group Construction Inc. is owned by Meng Hua Wang.

* The individuals identified in this Verified Statement and Exhibit A, other than Mr. Bai, are family members and related to Meng Hua Wang.

CERTIFICATE OF SERVICE

I hereby certify that on December 11, 2020, a copy of the *Verified Statement of Kravit Partners, LLC Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure* was filed electronically. Notice of this filing will be sent through the Court's Electronic Case Filing System ("ECF System") via e-mail to all parties receiving such notice by operation of the ECF System. Parties may access said filing through the ECF System.

I hereby certify that the foregoing statements made by me are true.

Dated: December 11, 2020
New York, New York

KRAVIT PARTNERS LLC

By: /s/ Margarita Y. Ginzburg
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